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Attorneys for Defendant CoreCivic

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ATLP, a minor, by and through his Guardian
Ad Litem Tayloria Taylor; and AJB, a minor,
by and through his Guardian Ad Litem
Tayloria Taylor, and Tayloria Taylor as Co-
Special Administrator of the Estate of Brandon
Lavon Patton, Deceased,

Plaintiffs,

v.

CoreCivic, Inc., formerly Corrections
Corporation of America, a foreign corporation
d/b/a Nevada Southern Detention Center; Doe
CoreCivic Employees I through XX; Does I
through X; and Roe Entities I through X,
inclusive,

Defendants.

Case No. 2:21-cv-02072-JCM-EJY

**STIPULATION AND
ORDER TO EXTEND THE
DEADLINES TO FILE REPLIES
IN SUPPORT OF MOTION FOR
SUMMARY JUDGMENT AND
DAUBERT MOTION**

Plaintiffs, Tayloria Taylor, as Co-Special Administrator of the Estate of Brandon
Patton, ATLP, and AJB (collectively, “Plaintiffs”), and Defendant, CoreCivic, Inc.
 (“Defendant”), stipulate to extend the deadline for Defendant to file its Replies in Support of

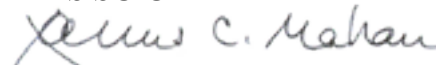
1 Motion for Summary Judgment and *Daubert* Motions from October 4, 2024 to October 25,
2 2024. (Dkts. 112; 113.) For the following reasons, the parties respectfully request that the
3 Court approve their Stipulation to extend these deadlines.

4 Good cause exists to extend these deadlines to October 25, 2024. While undersigned
5 counsel has been diligently reviewing Plaintiff's Response to Defendant's Motion for
6 Summary Judgment and Response to Defendant's *Daubert* Motion to Exclude Testimony of
7 Ryan D. Herrington, M.D., M.P.H. (*see* Dkts. 116; 117), undersigned counsel requires
8 additional time to do so prior to preparing CoreCivic's Replies. Defense counsel also requires
9 additional time, as both are preparing for out-of-state trials in other matters (one of which,
10 was recently added to counsel's calendar). *See, e.g., Taplin v. CoreCivic, et al.*, No. 101-CV-
11 2021-00896 (N.M.); *Rooks v. CoreCivic, et al.*, No. CJ-2022-03360 (Okla.). This extension
12 will not affect any other case management deadlines.

13 For the foregoing reasons, the parties respectfully request that the Court approve their
14 Stipulation and extend the deadline for Defendant to file its Replies in Support of Motion for
15 Summary Judgment and *Daubert* Motions from October 4, 2024 to October 25, 2024.

16 DATED this 26th day of September, 2024.

17
18
19 **IT IS SO ORDERED:**

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21 UNITED STATES DISTRICT JUDGE

22 DATED: September 30, 2024

STRUCK LOVE BOJANOWSKI & ACEDO, PLC

By /s/ Kristina R. Rood

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By /s/ Paola M. Armeni

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CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2024, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Paola Armeni parmeni@clarkhill.com
Gia N. Marina gmarina@clarkhill.com

I hereby certify that on this same date, I served the attached document by U.S. Mail, postage prepaid, on the following, who is not a registered participant of the CM/ECF System:

N/A

/s/ E. Glover